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ORIGINAL

INTERVENTION

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

Arizona Corporation Commission

DOCKETED

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AZ CORP COMMISSION
DOCUMENT CONTROL

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IN THE MATTER OF THE APPLICATION OF
THE ARIZONA ELECTRIC DIVISION OF
CITIZENS COMMUNICATIONS COMPANY TO
CHANGE THE CURRENT PURCHASED
POWER AND FUEL ADJUSTMENT CLAUSE
RATE, TO ESTABLISH A NEW PURCHASED
POWER AND FUEL ADJUSTMENT CLAUSE
BANK, AND TO REQUEST APPROVED
GUIDELINES FOR THE RECOVERY OF COSTS
INCURRED IN CONNECTION WITH ENERGY
RISK MANAGEMENT INITIATIVES.

Docket No. E-01032C-00-0751

MOTION TO INTERVENE

Mohave County Economic Development Authority, Inc. ("MCEDA"), through undersigned counsel, hereby moves the Arizona Corporation Commission to grant MCEDA leave to intervene in the above-captioned proceeding, pursuant to A.A.C. R14-3-105. In support hereof, MCEDA states as follows:

1. MCEDA was established in 1995 as an Arizona non-profit corporation to promote, coordinate and assist economic development in Mohave County, Arizona. MCEDA's Board of Directors is comprised of representatives of a broad range of businesses (including educational institutions) from Mohave County. MCEDA participated as an intervenor in the last Citizens Utilities Company ("Citizens")-Mohave County service territory rate case proceeding.

2. Citizens' proposed changes to its purchase power and fuel adjustment clause and related rates will have a direct and substantial impact on MCEDA and economic development in Mohave County. No other party to this proceeding can

ROSHKA HEYMAN & DEWULF, PLC
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1 represent the interests of MCEDA as adequately as MCEDA, itself.

2 3. MCEDA's participation in this proceeding will not unduly broaden the
3 nature or scope of this proceeding. MCEDA, like the Commission, desires to determine
4 the impact of Citizens' proposal and whether it is in the public interest. MCEDA does not
5 intend to seek any extension to filing dates in this docket.

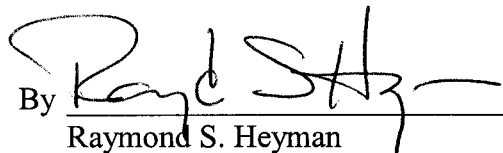
6 4. Service of all correspondence, documents or pleadings should be made
7 to counsel for MCEDA as follows:

8 Raymond S. Heyman, Esq.
9 Michael W. Patten, Esq.
10 Roshka Heyman & DeWulf, PLC
11 400 East Van Buren Street, Suite 800
12 Phoenix, Arizona 85004
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14 fax: (602) 256-6800

15 For the foregoing reasons, MCEDA respectfully requests that the Commission issue
16 its Order granting this Motion to Intervene.

17 RESPECTFULLY SUBMITTED January 9, 2002.

18 **Roshka Heyman & DeWulf, PLC**

19 By 

20 Raymond S. Heyman
21 Michael W. Patten
22 One Arizona Center
23 400 East Van Buren Street, Suite 800
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26 Attorneys for Mohave County Economic
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ORIGINAL and 10 COPIES of the foregoing
filed January 9, 2002, with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

COPIES of the foregoing hand-delivered
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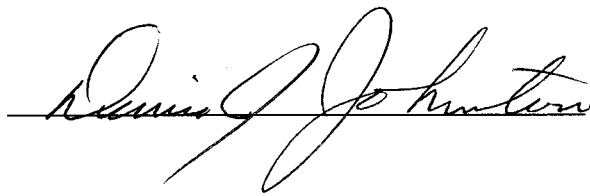
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A handwritten signature in cursive script, appearing to read "Dennis J. Hunter", is written over a horizontal line.